## EXHIBIT 34

IN THE UNITED STATES DISTRICT COURT FOR THE MORTHERN DISTRICT OF ILLINOIS SEASTERN DIVISION  LEASTERN DIVISION  LEASTERN DIVISION  UNITED STATES FIDELITY AND GUARANTY COMPANY, ) Plaintiff, ) Season, ) O Blaintiff, ) Season, ) O Barrier, Davis Residual of the stiffed further as follows: FURTHER EXAMINATION Season, my name is Jim Nyeste. I O Q. Mould you state your name again, please. A. Jris Robinson, my name is Jim Nyeste. I O Q. And to my right is — MS. SKAGGS: Amy Skaggs, representing VOA A Associates. THE WITNESS: All right. BY MR. NYESTE: O Q. And this is going to be a short supplemental deposition, no more than an hour, by agreement among everyone here —  Page 131 PRESENT: Page 131 PRESENT: Page 133 PRESENT: Page 134 PRESENT: Page 135 PRESENT: Page 136 A. Okay. Q. — and probably much less than that, to follow up on — well, after our initial deposition session you called my office and left me a voice mail, right? A. Correct. Q. And you also sent me an e-mail, I believe? A. Correct. Q. And you also sent me an e-mail, I believe? A. Correct. Q. And this is going to focus on the reservation of rights letter. We're not going to cover all the other ground in the deposition, but we're going to focus on that — the spring of 2005. There was a duly sworm. Called as a witness herein, having been previously duly sworm and having testified, was examined and testiffed interter as follows: FURTHERE EXAMINATION BY MR. NYESTE: Q. And to my right is — MS. SKAGGS: Amy Skaggs, representing VOA Associates. THE WITNESS: All right. BY MR. NYESTE: Q. And this is going to be a short upplemental deposition, no more than an hour, by agreement among everyone here — Page 131 PRESENT: A. Okay.		Page 130		Page 132
2 FOR THE NORTHERN DISTRICT OF ILLINOIS 3 EASTERN DIVISION 4 4 UNITED STATES FIDELITY ) 5 UNITED STATES FIDELITY ) 6 AND GUARANTY COMPANY, ) 7 Plaintiff, ) 8 vs. ) No. 08 C 862 8 BY MR. NYESTE: 9 VOA ASSOCIATES, INC., ) 10 LIBERTY INTERNATIONAL. ) 11 UNDERWRITERS, MICHAEL I. ) 12 MADDEN and JEAN MADDEN, ) 13 Defendants. ) 14 LIBERTY INTERNATIONAL. ) 15 March 17, 2009 16 5:48 p.m. 17 16 March 17, 2009 16 5:48 p.m. 17 17 The deposition of IRIS LISA ROBINSON, 18 18 The deposition of IRIS LISA ROBINSON, 19 19 resumed pursuant to adjournment, taken before 20 JEANETTE F, RUTZ, a Notary Public within and for 12 the County of DaPage, State of Illinois, and a 21 Certified Shorthand Reporter of said state, on the 23 2nd Floor, 215 Shuman Boulevard, Naperville, 24 Illinois. 19 1 PRESENT: 1 PRESENT: 1 Page 131 1 PRESENT: 2 KARBAL COHEN, ECONOMOU, SILK & DUNNE, LLC, 2 (200 South Michigan Avenue, 20th Floor, 213 Shuman Boulevard, Naperville, 24 Illinois 60604, 312-431-3700, by: 5 SCHIFF HARDIN, LLP, 23 35 south Wacker Drive, Suite 6600, 11 Chicago, Illinois 60604, 312-431-3700, by: 5 SCHIFF HARDIN, LLP, 23 35 south Wacker Drive, Suite 6600, 11 Chicago, Illinois 60604, 312-28-5728, by: 13 MS. AMY R. SKAGOS, 13 MR. AMES T. NYESTE, ESQ. (One Nuth Labella, Collection, 10 the form of the question. 10 the form of the question. 10 the form of the question. 10 the form of rights letter. We're not going to cover all the other ground in the deposition, but we're going to focus on that - the spring of 2005. There was a draft reservation of rights letter. 20 Cannet of the plainer of 2005, and then the county of the foliance of the form of the duestion of rights letter. 20 Cannet of the plainer of 2005, and then the county and the	1	IN THE UNITED STATES DISTRICT COURT	1	(WHERELIPON) the witness was duly
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6 AND GUARANTY COMPANY, 7 Plaintiff, 9 8 vs. ) No. 08 C 862 9 VOA ASSOCIATES, INC. ) 10 LIBERTY INTERNATIONAL ) 10 LIBERTY INTERNATIONAL ) 11 UNDERWRITERS, MICHAEL J. ) 11 Q. MADDEN and JEAN MADDEN, ) 12 MADDEN and JEAN MADDEN, ) 12 Pefendants. ) 13 A. Okay. 14 Q. And to my right is — 15 March 17, 2009 15 March 18 The deposition of IRIS LISA ROBINSON, 18 BY MR. NYESTE: 12 Persesent Liberty Insurance Underwriters. 14 Q. And to my right is — 16 March 17, 2009 15 March 17, 2009 15 March 17, 2009 15 March 17, 2009 15 March 18, 200, And to my right is — 17 March 18, 200, And to my right is — 18 March 17, 2009 15 March 18, 200, And to my right is — 18 March 17, 2009 15 March 18, 200, And to my right is — 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you're represented again today by Roy Dunne, right? 19 Q. And you also sent	5	UNITED STATES FIDELITY )	1	
7   Plaintiff,   8   vs.   No. 08 C 862   8   BY MR. NYESTE:   9   Q. Would you state your name again, please.   10   A. Iris Robinson.   11   UNDERWRITERS, MICHAEL J.   11   MADDEN and JEAN MADDEN.   12   represent Liberty Insurance Underwriters.   13   A. Okay.   14   Q. And to my right is   15   March 17, 2009   15   MS. SKAGGS: Amy Skaggs, representing VOA   16   Associates.   17   THE WITNESS: All right.   18   The deposition of IRIS LISA ROBINSON,   19   resumed pursuant to adjournment, taken before   12   Idlinois.   18   The County of DuPage, State of Illinois, and a   22   Certified Shorthand Reporter of said state, on the   23   2nd Floor, 215 Shuman Boulevard, Naperville,   24   Illinois.   18   The County of DuPage, State of Illinois, and a   22   Certified Shorthand Reporter of said state, on the   23   2nd Floor, 215 Shuman Boulevard, Naperville,   24   Illinois.   24   Illinois.   25   A. Yes.   26   Q. And this is going to be a short   27   3ugreement among everyone here   28   Page 133   7PRESENT:   1   A. Okay.   2   Q and probably much less than that, to   follow up on well, after our initial deposition   28   Session you called my office and left me a voice   mail, right?   3   A. Correct.   Q. And you're represented again today by   24   agreement among everyone here   27   28   A. Yes.   29   A. Okay.   20   And you're represented again today by   21   A. Okay.   20   And you're represented again today by   21   A. Okay.   22   Q and probably much less than that, to   follow up on well, after our initial deposition   28   Session you called my office and left me a voice   mail, right?   A. Correct.   Q. And you also sent me an e-mail, I   believe?   A. Correct.   Q. Okay. And I deduced from the voice mail and the e-mail that you had some second thoughts   about some of the things you testified to.   A. Correct.   Q. And this is going to focus on the   reservation of rights letter. We're not going to cover all the other ground in the deposition, but   we're going to	1 .	,		· · · · · · · · · · · · · · · · · · ·
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Page 131  PRESENT:  KARBAL, COHEN, ECONOMOU, SILK & DUNNE, LLC, 2  KARBAL, COHEN, ECONOMOU, SILK & DUNNE, LLC, 3  (200 South Michigan Avenue, 20th Floor, 4  Chicago, Illinois 60604, 5  MR. RODERICK T. DUNNE, 6  MR. RODERICK T. DUNNE, 7  appeared on behalf of the Plaintiff; 7  SCHIFF HARDIN, LLP, 9  Chicago, Illinois 60606, 11  Chicago, Illinois 60606, 11  Chicago, Illinois 60606, 11  MS. AMY R. SKAGGS, 13  MS. AMY R. SKAGGS, 13  MS. AMY R. SKAGGS, 13  MR. JAMES T. NYESTE, ESQ., 17  MR. JAMES T. NYESTE, ESQ., 17  Chicago, Illinois 60602, 19  Chicago, Illinois foofolant 20  312-750-1814), 20  we're going to focus on that the spring of 2005. There was a draft reservation of rights letter. We're not going to to cover all the other ground in the deposition, but we're going to focus on that the spring of 2005. There was a draft reservation of rights letter. 20  date of Page 133  A. Okay.  A. Okay.  A. Orrect.  Q. And you also sent me an e-mail, I believe, 2005, and then a voice mail, right?  A. Correct.  Q. And you also sent me an e-mail, I believe, 2005, and then	23		1	<del>-</del>
Page 131  PRESENT:  KARBAL, COHEN, ECONOMOU, SILK & DUNNE, LLC, (200 South Michigan Avenue, 20th Floor, Chicago, Illinois 60604, 4 session you called my office and left me a voice mail, right?  MR. RODERICK T. DUNNE, 6 A. Correct. 7 Q. And you also sent me an e-mail, I believe?  SCHIFF HARDIN, LLP, 9 A. Correct. 10 (233 South Wacker Drive, Suite 6600, 11 Chicago, Illinois 60606, 11 and the e-mail that you had some second thoughts about some of the things you testified to. 13 appeared on behalf of Defendant 15 VOA Associates, Inc.; 16 (One North LaSalle Street, Suite 2100, 19 Chicago, Illinois 60602, 19 cover all the other ground in the deposition, but we're going to focus on the reservation of rights letter 22 dated February 24th, I believe, 2005, and then	24	•	ą.	· · ·
PRESENT:  1 A. Okay.  2 KARBAL, COHEN, ECONOMOU, SILK & DUNNE, LLC.,  3 (200 South Michigan Avenue, 20th Floor,  4 Chicago, Illinois 60604,  5 312-431-3700), by:  6 MR. RODERICK T. DUNNE,  7 appeared on behalf of the Plaintiff;  8 Believe?  9 SCHIFF HARDIN, LLP,  10 (233 South Wacker Drive, Suite 6600,  11 Chicago, Illinois 60606,  12 312-258-5728), by:  13 MS. AMY R. SKAGGS,  14 appeared on behalf of Defendant  15 VOA Associates, Inc.;  16 MR. JAMES T. NYESTE, ESQ.,  17 (One North LaSalle Street, Suite 2100,  18 (One North LaSalle Street, Suite 2100,  20 And you also sent me an e-mail, I believe?  A. Correct.  Q. And you also sent me an e-mail, I believe?  A. Correct.  Q. Okay. And I deduced from the voice mail and the e-mail that you had some second thoughts about some of the things you testified to.  A. Correct.  MR. DUNNE: Objection to the form of the question.  BY MR. NYESTE:  Q. And this is going to focus on the reservation of rights letter. We're not going to cover all the other ground in the deposition, but we're going to focus on that the spring of 2005.  There was a draft reservation of rights letter  dated February 24th, I believe, 2005, and then		Page 131		
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MS. AMY R. SKAGGS,  appeared on behalf of Defendant  VOA Associates, Inc.;  MR. JAMES T. NYESTE, ESQ.,  (One North LaSalle Street, Suite 2100,  Chicago, Illinois 60602,  312-750-1814),  appeared on behalf of Defendant  Liberty International Underwriters.  A. Correct.  MR. DUNNE: Objection to the form of the question.  15 question.  16 BY MR. NYESTE:  Q. And this is going to focus on the reservation of rights letter. We're not going to cover all the other ground in the deposition, but we're going to focus on that the spring of 2005.  There was a draft reservation of rights letter dated February 24th, I believe, 2005, and then	l			
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VOA Associates, Inc.;  15 question.  16 BY MR. NYESTE:  17 MR. JAMES T. NYESTE, ESQ.,  18 (One North LaSalle Street, Suite 2100,  19 Chicago, Illinois 60602,  20 312-750-1814),  21 appeared on behalf of Defendant  22 Liberty International Underwriters.  15 question.  16 BY MR. NYESTE:  17 Q. And this is going to focus on the  18 reservation of rights letter. We're not going to  20 cover all the other ground in the deposition, but  21 we're going to focus on that the spring of 2005.  22 There was a draft reservation of rights letter  23 dated February 24th, I believe, 2005, and then	1	· · · · · · · · · · · · · · · · · · ·		
16 BY MR. NYESTE: 17 MR. JAMES T. NYESTE, ESQ., 18 (One North LaSalle Street, Suite 2100, 19 Chicago, Illinois 60602, 20 312-750-1814), 21 appeared on behalf of Defendant 22 Liberty International Underwriters. 23 PRINCE TE: 18 Q. And this is going to focus on the 19 reservation of rights letter. We're not going to 20 cover all the other ground in the deposition, but 21 we're going to focus on that the spring of 2005. 22 There was a draft reservation of rights letter 23 dated February 24th, I believe, 2005, and then	ĺ			
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Liberty International Underwriters.  22 Liberty International Underwriters.  23 dated February 24th, I believe, 2005, and then				
dated I columny 24th, I believe, 2005, and then				
	23	REPORTED BY: JEANETTE F. RUTZ, CSR, RPR,	23	there was another reservation of rights letter
24 CSR CERTIFICATE NO. 84-3809. 24 dated May 4, 2005. And those are, respectively,				

	Page 13	4	Page 136
1	Exhibits 8 and 9 that we looked at the first time.	1	
2		2	
3	whether these were sent out or the circumstances	3	8.7
4	surrounding their preparation; is that right?	4	<b>2</b>
5	MR. DUNNE: Objection to the form of the	5	
6	question, but go ahead.	6	c system, year and amended just a
7	BY THE WITNESS:	7	
8	A. Yes, I had some concerns.	8	
9	BY MR. NYESTE:	9	
10	Q. All right. With respect to Exhibit 8,	10	
11	the reservation of rights letter dated February 24,	11	
12	2005, I believe it was your testimony in the first	12	
13	deposition that this one was not sent out to	13	
14	anyone?	14	
15	A. That, I can't recall, because I I	15	
16	can't recall that. I would have to look at the	16	Kurt Beranek.
17	deposition to remember that part. Because I want	17	A. Okay.
18	to say this one did go out, but I want to make	18	Q. So I would accept that this document,
19	sure.	19	Exhibit 9, was faxed to Mr. Beranek's office. All
20	Q. I knew I was taking a risk there by	20	right?
21	bringing up Exhibit 8.	21	A. Okay.
22	Let's fast forward a little,	22	Q. Do you have any note, any certified
23	Ms. Robinson. I know Mr. Dunne is going to object	23	mailing receipt, any evidence of any sort that this
24	to the form of this question, but what is it you	24	May 4, 2005, reservation of rights letter was
	Page 135		Page 137
1	want to tell me?	1	indeed mailed to VOA?
2	MR. DUNNE: I'll object to the form of the	2	MR. DUNNE: Objection, asked and answered.
3	question just because you said I would.	3	BY THE WITNESS:
4	Go ahead.	4	A. No certified.
5	BY THE WITNESS:	5	BY MR. NYESTE:
6	A. That May the 4th, I have definite	6	Q. Any other evidence?
7	recollection that the letter was faxed. It was	7	MR. DUNNE: Objection to the form of the
8	faxed and it was mailed out. It did not go	8	question.
9	certified.	9	BY THE WITNESS:
10	BY MR. NYESTE:	10	A. Pardon me?
11	Q. The May 4th letter, Exhibit 9, right?	11	BY MR. NYESTE:
12	A. Correct.	12	Q. Do you have any other evidence
13	Q. You're confident that it was faxed to	13	A. No.
14	whom?	14	Q that this was mailed to VOA?
15	A. It was faxed to the attorney. Was it	15	A. Just what you have here.
16	Kurt	16	Q. Do you have a specific memory of putting
17	Q. Beranek?	17	it in of taking it to a post office, perhaps?
18	A. Beranek. It was faxed to him. And that	18	MR. DUNNE: Objection, asked and answered.
19	the letter more than likely, I did not let Steve	19	BY MR. NYESTE:
20	Heckman or Adam Lutz review it. Because of the	20	Q. Your answer is
21	pressure, I sent it out. That's what I was saying	21	A. No.
22	in the e-mail.	22	Q. Do you have a specific memory of putting
23	Q. You sent it out without them having	23	it in a mailbox on the street?
24	reviewed it?	24	MR. DUNNE: Objection, asked and answered.

l	Page 138		Page 140
1	BY THE WITNESS:	1	Q. And where were you working as of
2	A. No.	2	April 8, 2005?
3	BY MR. NYESTE:	3	A. In the Chicago branch office.
4	Q. Do you have a specific memory of handing	4	Q. And a month later you are confident that
5	it to the postman at your home?	5	you were still working in the Chicago office?
6	A. No.	6	A. Yes.
7	Q. Do you have a specific memory of somehow	7	Q. When did you begin working in the
8	putting this in the mail, one way or the other?	8	Naperville office?
9	MR. DUNNE: Objection, asked and answered.	9	A. I didn't clarify that date yet. I'm
10	Go ahead.	10	sorry.
11	BY THE WITNESS:	11	Q. Was there a time in the spring of 2005
12	A. We had a bin at that time. It was	12	when you weren't working in either the Chicago or
13	located on top of a bookshelf or file cabinets	13	Naperville office but instead were an outside
14	where we would put the mail in.	14	investigator?
15	BY MR. NYESTE:	15	A. I was outside. I was still considered
16	Q. Okay. And where was this? In	16	an outside adjuster May of '05 and April '05. I
17	Naperville? In Chicago? Somewhere else?	17	was still doing outside work and inside, but mostly
18	A. In Chicago.	18	inside.
19	Q. So you believe you mailed this letter,	19	Q. As of May 4, 2005, did you have a
20	the May 4, 2005, reservation of rights letter, from	20	regular cubicle or an office at the Chicago office
21	the St. Paul Travelers office in Chicago?	21	of St. Paul Travelers?
.22	A. Yes.	22	A. Yes, I had a regular cubicle.
23	Q. Is there anything that would confirm	23	Q. Did you have a computer?
24	that for you or that would show that to me?	24	A. Yes.
	Page 139		Page 141
1	MR. DUNNE: Objection, form of the question.	1	Q. I believe you were thinking at one point
1 ~			Z. Zozazo Jose II. za
2	BY THE WITNESS:	2	that this letter may have been on a diskette or a
3	BY THE WITNESS:  A. No, I have nothing to show that to you.		
1		2	that this letter may have been on a diskette or a
3	A. No, I have nothing to show that to you.	2 3	that this letter may have been on a diskette or a floppy
3 4	A. No, I have nothing to show that to you. BY MR. NYESTE:	2 3 4	that this letter may have been on a diskette or a floppy A. Correct. Q and not on a computer hard drive. What is your thinking on that issue today?
3 4 5	<ul><li>A. No, I have nothing to show that to you.</li><li>BY MR. NYESTE:</li><li>Q. When you testified before in your first</li></ul>	2 3 4 5	that this letter may have been on a diskette or a floppy A. Correct. Q and not on a computer hard drive.
3 4 5	<ul><li>A. No, I have nothing to show that to you.</li><li>BY MR. NYESTE:</li><li>Q. When you testified before in your first deposition session, I believe you were uncertain as</li></ul>	2 3 4 5 6	that this letter may have been on a diskette or a floppy A. Correct. Q and not on a computer hard drive. What is your thinking on that issue today? A. Yes. As an outside, I kept floppies so I could go back and forth with my letters.
3 4 5 6 7	A. No, I have nothing to show that to you. BY MR. NYESTE:  Q. When you testified before in your first deposition session, I believe you were uncertain as to where you were in May of 2005; whether in the Chicago office, the Naperville office, or perhaps acting as an outside adjuster or investigator. Has	2 3 4 5 6 7 8 9	that this letter may have been on a diskette or a floppy A. Correct. Q and not on a computer hard drive. What is your thinking on that issue today? A. Yes. As an outside, I kept floppies so I could go back and forth with my letters. Q. Why did you need to have floppies when
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	Page 142		Page 144
1	BY MR. NYESTE:	1	MR. DUNNE: Wait for him to ask a question.
2	Q. Would the hard drive of your computer in	2	BY MR. NYESTE:
3	the Chicago office have had a file corresponding to	3	Q. And in March?
4	this letter?	4	A. Yes.
5	A. It could have. I think those computers	5	Q. During March, April, May of 2005, did
6	probably would be destroyed by now.	6	there come a point in time when you no longer had
7	MR. DUNNE: Iris, please don't speculate.	7	access to the electronic notes system?
8	BY MR. NYESTE:	8	A. Those months again?
9	Q. Was it your practice to keep the	9	Q. March, April, and May of 2005.
10	principal file on the hard drive and only put	10	A. I would have had access to the
11	copies or certain files on the floppies?	11	electronic notes.
12	MR. DUNNE: Objection to the form of the	12	Q. Do you have any explanation as to why
13	question.	13	there is no entry in the electronic notes that this
14	If you understand the question, you can	14	May 4, 2005, reservation of rights letter was sent
15	answer it.	15	out?
16	BY THE WITNESS:	16	MR. DUNNE: Objection, asked and answered.
17	A. I couldn't recall.	17	Go ahead.
18	BY MR. NYESTE:	18	BY THE WITNESS:
19	Q. What would determine whether the	19	A. It should have been an entry.
20	letter a letter or other document was on the	20	BY MR. NYESTE:
21	floppy versus on the hard drive?	21	Q. And if there is no entry, what would
22	A. Reservation of rights letters I would	22	that indicate?
23	try to keep and compose on the floppy.	23	MR. DUNNE: Objection to the form of the
24	Q. So you believe you put this letter	24	question, calls for speculation.
raceceppeoperations	Page 143	enceloszoneogálásásolnása	Page 145
1	addressed to VOA in a mailing bin on top of a file	1	BY THE WITNESS:
2	cabinet; is that right?	2	A. There should have been an entry later on
3	A. Correct.	3	by either Steve or me.
4	Q. And then what was the ordinary practice	4	•
5	Q. This man what was the ordinary protection		BY MR. NYESTE:
	of what would happen to the items in that bin?		BY MR. NYESTE:  O. And if there wasn't, would that indicate
6	of what would happen to the items in that bin?  A. Usually, at a certain time one of the	5	Q. And if there wasn't, would that indicate
6 7	A. Usually, at a certain time one of the	5 6	Q. And if there wasn't, would that indicate that it wasn't sent; that the letter wasn't sent?
7	A. Usually, at a certain time one of the clerks or the assistants would come by and pick	5 6 7	Q. And if there wasn't, would that indicate that it wasn't sent; that the letter wasn't sent?  MR. DUNNE: Objection, form of the question.
7 8	A. Usually, at a certain time one of the clerks or the assistants would come by and pick them up and take them out to be stamped and mailed	5 6 7 8	Q. And if there wasn't, would that indicate that it wasn't sent; that the letter wasn't sent?  MR. DUNNE: Objection, form of the question. BY THE WITNESS:
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- 1	Page 14	5	Page 148
1		1	read back?
2	_	$\frac{1}{2}$	
3		3	
4		8	Read back the question.
5		4	(WHEREUPON, the record was read
6		5	by the reporter as requested.)
7	107,	6	BY THE WITNESS:
8	you recall leaving that message in a voice mail?  A. On the voice mail.	7	A. I didn't know it was not in their file.
9		8	BY MS. SKAGGS:
	Q. And you speculated it may have been on a	9	Q. Did you print it out and put it in the
10	disk because when you transferred from Chicago to	10	file?
11	Naperville, your computer was not transferred with	11	A. It would have been, yes.
12	you. Do you recall leaving that on the voice mail	12	Q. So your recollection is that you printed
13	message?	13	out a copy of this letter and put it in USF&G's
14	A. No, I don't remember that part.	14	file?
15	Q. Okay. If you were mailing this letter	15	A. Yes.
16	from the Chicago office, why were you saving it on	16	Q. Okay. Did you do that at the same time
17	a disk?	17	that you mailed it to VOA?
18	A. I was saving most of my letters on disk,	18	A. Yes, should have been.
19	reservation of rights and other letters, also,	19	Q. You have a specific recollection of
20	doctors and different forms, the language, to keep	20	doing that, as well?
21	the lingo the same.	21	A. Yes.
22	Q. And why were you doing that?	22	Q. Was this the same day that you faxed it
23	A. Because I was outside/inside adjuster,	23	to Kurt Beranek?
24	also. So I had letters I had done at home. I	24	A. Yes.
	Page 147		Page 149
1	would bring them into the office.	1	Q. Do you have a specific recollection of
2	Q. So at the time that you left your	2	faxing it to Kurt Beranek?
3	message on Mr. Nyeste's voice mail, just so that	3	A. Yes.
4	I'm clear, you were speculating about whether or	4	Q. So is it your testimony that in May 2005
5	not you had saved something on a floppy disk. Are	5	you were working both out of Chicago and Naperville
6	you now clear as to that recollection?	- 6	or you had not yet gone to Naperville?
7	A. Yes, pretty much so, yes.	7	A. I don't believe I had gone to Naperville
8	Q. So today you think that you had it on	1	A. I don't beneve I had gone to Napervine
	e. So today you willing that you must tom	8	yet. I'm pretty sure.
9	disk and printed it off of a disk in Chicago?	8 9	yet. I'm pretty sure.
9 10		1	_
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	Page 150	)	Page 152
	J The state of the	1	STATE OF ILLINOIS )
2		2	) SS:
$\frac{1}{3}$	- French Lagranger	3	COUNTY OF DUPAGE )
4	e = 5 5 5 1 5 5 min turking to 1711. Hocking in	4	I, JEANETTE F. RUTZ, a Notary Public
5	y and that you were	5	within and for the County of DuPage, State of
6	g and the second of rights letter.	6	Illinois, and a Certified Shorthand Reporter of
7		7	said state, do hereby certify:
8	e	8	That previous to the commencement of the
9		9	examination of the witness, the witness was duly
10	J The state of the	10	sworn to testify the whole truth concerning the
11	correct?	11	matters herein;
12		12	That the foregoing deposition transcript
13	8	13	was reported stenographically by me, was thereafter
14	MR. NYESTE: We're done.	14	reduced to typewriting under my personal direction
15	MS. REPORTER: Signature?	15	and constitutes a true record of the testimony
16	MR. NYESTE: Do you want to reserve or waive?	16	given and the proceedings had;
17	MR. DUNNE: I reserved on the other one, so	17	That the said deposition was taken
18	I'll reserve.	18	before me at the time and place specified;
19	FURTHER DEPONENT SAITH NOT.	19	That I am not a relative or employee or
20		20	attorney or counsel, nor a relative or employee of
21		21	such attorney or counsel for any of the parties
22		22	hereto, nor interested directly or indirectly in
23		23	the outcome of this action.
24		24	IN WITNESS WHEREOF, I do hereunto set my
	Page 151		Page 153
1	IN THE UNITED STATES DISTRICT COURT	1	hand and affix my goal of office at China
2	FOR THE NORTHERN DISTRICT OF ILLINOIS	2	hand and affix my seal of office at Chicago, Illinois, this 20th day of March, 2009.
3	EASTERN DIVISION	3	minors, and zour day of March, 2009.
4	UNITED STATES FIDELITY )	4	
5	AND GUARANTY COMPANY, )	5	Notary Public,
6	Plaintiff, )	6	DuPage County, Illinois
7	vs. ) No. 08 C 862	7	My commission expires 12/01/10.
8	VOA ASSOCIATES, INC.,	8	wy commission expires 12/01/10.
9	LIBERTY INTERNATIONAL )	9	CSR Certificate No. 84-3809.
10	UNDERWRITERS, MICHAEL J. )	10	Con Contineate 140, 64-3609,
11	MADDEN and JEAN MADDEN, )	11	
12	Defendants. )	12	
13	I hereby certify that I have read the	13	
14	foregoing transcript of my resumed deposition given	14	
15	at the time and place aforesaid, consisting of	15	
16	Pages 130 to 150, inclusive, and I do again	16	
17	subscribe and make oath that the same is a true,	17	
18	correct and complete transcript of my resumed	18	
19	deposition so given as aforesaid, and includes	19	
20	changes, if any, so made by me.	20	
21	IRIS LISA ROBINSON	21	
22	SUBSCRIBED AND SWORN TO before me	22	
23	this day of , A.D. 2009.	23	
24	Notary Public	24	

1 2	Page 154  INDEX  WITNESS EXAMINATION	
3 4 5	IRIS LISA ROBINSON (resumed) By Mr. Nyeste 132 By Ms. Skaggs 145	
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	By Mr. Dunne 149  EXHIBITS  NUMBER MARKED FOR ID  NO EXHIBITS MARKED.	
21 22 23 24		
The state of the s		